

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>NIMITZ TECHNOLOGIES LLC,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>CNET MEDIA, INC.,</b>  <b>Defendant.</b>	<b>C.A. No. 1:21-cv-01247-CFC</b>
<b>NIMITZ TECHNOLOGIES LLC,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>BUZZFEED, Inc.,</b>  <b>Defendant.</b>	<b>Case No. 1:21-cv-01362-CFC</b>
<b>NIMITZ TECHNOLOGIES LLC,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>IMAGINE LEARNING LLC,</b>  <b>Defendant.</b>	<b>Case No. 1:21-cv-01855-CFC</b>
<b>NIMITZ TECHNOLOGIES LLC,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>BLOOMBERG L.P.,</b>  <b>Defendant.</b>	<b>Case No. 1:22-cv-00413-CFC</b>

**NIMITZ' IN CAMERA DOCUMENT PRODUCTION**

Plaintiff Nimitz Technologies LLC ('Nimitz') hereby submits to the Court *in camera* the documents requested in the Court's Memorandum of November 10, 2022.

The production is made without prejudice to Nimitz' continuing objection to the production of documents which are protected by the attorney-client privilege, and to the requirement to produce any documents.

To avoid producing unnecessary bulk, Nimitz has not printed copies of court filings that were attached to some emails. Nimitz is also producing all requested emails, but some of the emails are in chains that include other emails.

Nimitz has attempted to produce the documents in an organized fashion by topic following as best possible the sequence in the Discovery Order. The production is detailed in the attached schedule.

Some documents are marked "Confidential," others "Confidential – Attorney -Client Privilege" and other are marked "confidential – Common Interest Attorney Client Privilege." Plaintiff respectfully requests that all such documents and their content remain *in camera* and not be made public.

Respectfully Submitted.

Dated: April 6, 2023

/s/ George Pazuniak  
George Pazuniak (#478)  
O'Kelly & O'Rourke, LLC  
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*Attorney for Plaintiff*

Request	Control Nos.	Comments
1. Any and all retention letters and/or agreements between Nimitz and O'Kelly & O'Rourke, LLC.	1-5	
2. Any and all communications and correspondence, including emails and text messages, that Mark Hall had with Mavexar, IP Edge, Linh Dietz, Papool Chaudhari, and/or any representative of Mavexar and/or IP Edge regarding:		
a. the formation of Nimitz;	6-12	Nimitz is producing the Nimitz formation documents. No written communications regarding the formation documents have been located.
b. assets, including patents, owned by Nimitz;	13-24, 746-51	See also PATENT ASSIGNMENT AGREEMENT at the end of production (inadvertently lacking a Bates number).
c. the potential acquisition of assets, including patents, by Nimitz;		No such documents have been located.
d. the nature, scope, and likelihood of any liability, including but not limited to attorney fees, expenses, and litigation costs, Nimitz could incur as a result of its acquisition of and/or assertion in litigation of any patent;		No such documents have been located.

<b>Request</b>	<b>Control Nos.</b>	<b>Comments</b>
e. U.S. Patent No. 7,848,328;	25-314 381-465	Other than a copies of the '328 Patent, the only documents that were located were mainly the initial claims charts for the and the briefing of the section 101 motion.
f. the retention of O'Kelly & O'Rourke, LLC to represent Nimitz in these cases;	315-322	
g. the settlement or potential settlement of these cases;	465-547	
h. the dismissal of these cases; and	465-547	
i. the November 4, 2022 hearing, including but not limited to the travel expenses and arrangements for Mr. Hall to attend the hearing.	323-381 548-737	
3. Any and all communications and correspondence, including emails and text messages, that George Pazuniak and/or any employee or representative of O'Kelly & O'Rourke, LLC had with Mavexar, IP Edge, Linh Dietz, Papool Chaudhari, and/or any representative of Mavexar and/or IP Edge regarding:		
a. the formation of Nimitz;		Litigation counsel had no involvement.
b. assets, including patents, owned by Nimitz;		Litigation counsel had no involvement.

Request	Control Nos.	Comments
c. the potential acquisition of assets, including patents, by Nimitz;		Litigation counsel had no involvement.
d. the nature, scope, and likelihood of any liability, including but not limited to attorney fees, expenses, and litigation costs, Nimitz could incur as a result of its acquisition of and/or assertion in litigation of any patent;		No such documents exist.
e. U.S. Patent No. 7,848,328;	25-314 381-465	Counsel also has the '38 Patent and the prosecution history of the patent.
f. the retention of O'Kelly & O'Rourke, LLC to represent Nimitz in these cases;	1-5	
g. the settlement or potential settlement of these cases;	465-547	
h. the dismissal of these cases; and	465-547	
i. the November 4, 2022 hearing, including but not limited to the travel expenses and arrangements for Mr. Hall to attend the hearing.	548-737	
4. Any and all monthly statements for any and all bank accounts held by Nimitz for the period July 1, 2021 through April 30, 2022.	752-756	Produced for July 1, 2021 through November 30, 2022. Remainder will be produced.

<b>Request</b>	<b>Control Nos.</b>	<b>Comments</b>
5. Any and all documents relating to Nimitz's use, lease, purchase, and/or retention of 3333 Preston Road STE 300, #1047, Frisco, TX 75034.	738-745	
a sworn declaration from Mark Hall that identifies any and all assets owned by Nimitz as of (1) August 30, 2021; (2) September 27, 2021; (3) December 31, 2021; and (4) March 30, 2022.	757-758	